

EXHIBIT 10

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
LINDSAY LIEBERMAN,

Plaintiff,

-against-

C.A. GOLDBERG, PLLC &
CARRIE A. GOLDBERG,

Defendants.

C.A. GOLDBERG, PLLC,

Counterclaim Plaintiff,

-against-

LINDSAY LIEBERMAN,

Counterclaim Defendant.

STATE OF NEW YORK)
) ss.:
COUNTY OF KINGS)

I, Naomi Leeds, declare, under penalties of perjury and pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am an Associate at C.A. Goldberg PLLC (“the Firm”). I was hired on March 24, 2021.
2. The last year has been the proudest and most fulfilling year of my life—not just because of the innovative work we produce for our survivor clients, but because of the comfortable work environment that has given me the opportunity to grow and to form lifelong bonds with each of my colleagues.
3. Carrie Goldberg (“Goldberg”) hired me in the middle of the pandemic, so immediately upon starting at the Firm I noticed how accommodating and compassionate she is when it comes to all things remote work, last-minute schedule changes, travel, family commitments, childcare, and mental health.
4. I worked remotely for the first ten months of my employment.

Case No. 21-CV-05053

**DECLARATION OF
NAOMI LEEDS**

5. Goldberg has made comments that during the first year of the pandemic, finances at the Firm were difficult, particularly with respect to keeping up office costs and making rent payments.

6. Goldberg has maintained the office, but at no point did Goldberg ever make me (or my colleagues) feel pressured to come into the office. Even when most New York City offices were mandating that their employees come to work in person, Goldberg created no such rule.

7. To this day, we are at liberty to independently decide whether to come into the office.

8. Since then, I've been going into the office every day purely because I thrive in the collaborative and hospitable work environment Goldberg facilitates.

9. I am fueled by the company of my colleagues and often request that everybody move their monitors into the conference room so we can work together in one big space.

10. I have been able to grow so close with the staff in such a short period of time because Goldberg's leadership style is one based on authenticity and humanity. We are not expected to produce at our optimal performance level each and every day because we are human and there are tons of circumstances that can, at times, get in the way of work.

11. At the Firm, we are entitled to bring our personal lives to the office because Goldberg understands that these two things cannot and should not be separated.

12. The parent members of our staff frequently have to miss – or leave early from – meetings to take care of their children. Goldberg is consistently supportive of this and has never taken issue with it.

13. I have never observed Goldberg treating pregnant women or parents in a discriminatory way.

14. Every Friday, we can attend a group therapy session with a licensed therapist provided by Goldberg.

15. Family members, friends, partners, and pets are allowed and encouraged to come to the office at any time of the day.

16. Often, my colleagues' children will accompany their parents to work when they don't have school or otherwise want to come spend the day at the office.

17. Family members, friends, partners, and pets are also invited to the work social events Goldberg hosts for the firm.

18. Recently, Goldberg hosted a work retreat in upstate New York, and one of my colleagues brought her son, another one brought her best friend, and almost all of us brought our dogs.

19. My friends and family often comment on how lucky I am to work for such a lenient and accommodating boss.

20. As a 26-year-old woman, I am one of eight members of the Firm's staff who are women between the ages of 20 and 44. The Firm employs 12 people in total.

21. I have been in a serious romantic relationship for six years and I often think about having children and starting a family of my own.

22. At no time during the hiring process did Goldberg inquire about my relationship or marital status or my intentions with respect to family planning.

23. If I choose to get pregnant and have children, I would be absolutely thrilled to have my children join the Firm's family. I am certain that I would not be treated any differently as a result.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 6, 2022



Naomi Leeds